

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

(1) GLEN A. PATTERSON,  
(2) NONA F. PATTERSON,

Plaintiffs,

v.

(1) FARMERS INSURANCE COMPANY,  
INC.,

Defendant.

Case No: CIV-14-1144-W

**NOTICE OF REMOVAL**

1. Farmers Insurance Company, Inc., ("Farmers"), is Defendant in a civil action brought against it in the District Court of Cleveland County, State of Oklahoma, and that action is styled *Glen A. Patterson, Nona F. Patterson, v. Farmers Insurance Company, Inc.*, Case No. CJ-2014-1152-TB.

2. At the time of the filing of this action and at the present time, Plaintiffs were and are, upon information and belief, citizens and residents of Cleveland County, State of Oklahoma. At the time of the filing of this action and at the present time, Defendant Farmers was and is a corporation duly organized and existing under the laws of the State of Kansas and no other state, with its principal place of business in Overland Park, Kansas; it is not a citizen of Oklahoma.

3. Plaintiffs plead damages in excess of \$ 75,000, punitive damages, interest, costs and attorney fees; therefore, the amount in controversy exceeds the sum of \$75,000, exclusive of interest and costs.

4. This is the kind of action of which the United States District Courts have original jurisdiction under 28 U.S.C. § 1332 because of diversity of citizenship and sufficiency of amount in controversy.

5. The state court action was commenced by service of summons upon defendant through the Oklahoma Insurance Commission on September 30, 2014. This Notice of Removal is, therefore, filed within the 30-day limits of 28 U.S.C. § 1446.

6. A copy of the docket sheet from the state court action is attached hereto as Exhibit 1. Copies of all process, pleadings and orders filed or served upon Defendant in the state court action are attached hereto as Exhibit 2 and made a part hereof.

Respectfully submitted,

s/Timila S. Rother

Timila S. Rother, OBA # 14310  
Daniel R. Burstein, OBA #31007

-Of the Firm-

**CROWE & DUNLEVY**

A Professional Corporation  
Braniff Building  
324 North Robinson Ave., Suite 100  
Oklahoma City, OK 73102-8273  
(405) 235-7757 (Telephone)  
(405) 272-5226 (Facsimile)  
[timila.rother@crowedunlevy.com](mailto:timila.rother@crowedunlevy.com)  
[daniel.burstein@crowedunlevy.com](mailto:daniel.burstein@crowedunlevy.com)

**ATTORNEYS FOR DEFENDANT  
FARMERS INSURANCE  
COMPANY, INC.**

**CERTIFICATE OF SERVICE**

I certify that on the same date this Notice of Removal was filed in the United States District Court for the Western District of Oklahoma that a true and correct copy of said Notice of Removal was served upon the above-named plaintiffs, by mailing said copies to Plaintiffs' attorney of record:

Gary L. Richardson  
Charles L. Richardson  
Mbilike Mwafulirwa  
**Richardson Richardson Boudreaux**  
7447 S. Lewis Ave.  
Tulsa, Oklahoma 74136

and further that a copy of said Notice of Removal was delivered to the Cleveland County Court Clerk for filing on the 20th day of October, 2014.

/s/ Timila S. Rother  
Timila S. Rother